

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

ALFRED FELICIANO,

Plaintiff,

v.

Civil Action No. 04-12461-GAO

GLOBALWARE SOLUTIONS, INC. and
GARY LORTIE,

Defendants.

and

GLOBALWARE SOLUTIONS, INC.,
and GARY LORTIE,

Third-Party Plaintiffs,

v.

JAMES R. BARTLETT,

Third-Party Defendant.

**JOINT MOTION TO EXTEND
DISCOVERY AND RELATED DEADLINES**

The parties in the above-captioned matter, through their counsel, hereby move to extend the discovery deadline to November 29, 2006. As grounds for this Motion, the parties state as follows:

1. At the Scheduling Conference held on January 23, 2006, the Court set September 15, 2006 as the deadline for completion of discovery in this matter, and also set a Status Conference for October 11, 2006.

2. Since the Scheduling Conference, the parties have engaged in substantial discovery, including multiple depositions. The parties recently have agreed to attempt to resolve this matter by mediation. The parties intend to complete mediation by mid-October 2006.

3. The parties desire to suspend discovery while they attempt to resolve this case by mediation. However, the parties will need to complete several depositions if mediation is not successful.

4. Neither the parties nor the Court will be in any manner prejudiced by this minor extension—rather, this extension will allow the parties to postpone additional time consuming and expensive litigation and focus instead on a mediated resolution to this case.

5. Accordingly, the parties respectfully request: (a) that the discovery deadline be extended by 75 days until November 29, 2006; (b) that the Status Conference set for October 11, 2006 be continued for 75 days; and (c) that all other remaining deadlines in this case be extended for 75 days.

WHEREFORE, for the reasons stated herein, the parties respectfully requests that the Court grant this Motion and extend the deadline for completion of discovery for 75 days, or until November 29, 2006 (and to extend the other remaining deadlines for 75 days).

Respectfully submitted,

ALFRED FELICIANO

GLOBALWARE SOLUTIONS, INC. and
GARY LORTIE

By his attorneys,

By their attorneys,

/s/ Christopher M. Waterman
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JAMES R. BARTLETT

By his attorneys,

/s/ Thomas S. Fitzpatrick
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Dated: September 14, 2006

CERTIFICATE OF SERVICE

I hereby certify that this document filed through the ECF system will be sent electronically to the registered participants as identified on the Notice of Electronic Filing (NEF) and paper copies will be sent to those indicated as non-registered participants on September 14, 2006.

/s/ Scott J. Connolly
Scott J. Connolly